



STATE OF MICHIGAN
BUREAU OF ELECTIONS
LANSING

May 23, 2022

REVIEW OF NOMINATING PETITION

PAUL JUNGE
Republican Candidate for U.S. Representative in Congress, 8th District

NUMBER OF VALID SIGNATURES REQUIRED: 1,000 signatures.

TOTAL FILING: 1,524 signatures.

RESULT OF FACE REVIEW: 1,435 facially valid signatures, 89 invalid signatures.

Total number of signatures filed		1,524
Not registered	<i>Less:</i>	1
Jurisdiction errors (no city in county known by name given by signer, dual jurisdiction entry, jurisdiction name given by signer does not align with address)	<i>Less:</i>	39
Date errors (no date given by signer, date of birth entered, or date given by signer is later than circulator's date of signing)	<i>Less:</i>	31
Address errors (no street address or rural route given)	<i>Less:</i>	4
Circulator errors (circulator did not sign or date petition, etc.)	<i>Less:</i>	12
Signature errors (no signature or incomplete signature)	<i>Less:</i>	2
TOTAL		1,435

Staff's face review of Mr. Junge's nominating petitions identified 89 invalid signatures and 1,435 facially valid signatures.

CHALLENGE: Nicholas Goyette submitted a challenge and supplemental challenge against Mr. Junge's nominating petitions.

In his first challenge, Mr. Goyette made 276 challenges to 226 individual signatures, largely alleging that the signature, address, date, or other required information was unclear. In his supplemental challenge, Mr. Goyette made an additional 154 challenges to 123 signatures.

Mr. Goyette also challenged the information contained in the header and the circulator certificated of several of Mr. Junge's petition sheets. Specifically, Mr. Goyette alleged that Mr. Junge printed an address of than Mr. Junge's home address in certain petition headers and that Mr. Junge improperly used the name "Paul Junge" rather than his full legal name "John Paul

Junge II” on certain petition headers. Mr. Goyette made similar challenges to circulator certificates signed by Mr. Junge.¹

Mr. Junge responded to the specific signature challenges, disputing many of the specific signature challenges and the validity of the header and circulator certificate issues raised. in this venue.

Staff recommend that the Board reject all of Mr. Goyette’s header and circulator certificate challenges. For the challenge to Mr. Junge’s name on petition header, staff notes that Mr. Junge indicated that he would like to appear as “Paul Junge” on the ballot when he submitted his Affidavit of Identity, and that under Michigan Election Law a “candidate may specify that both his or her given name and middle name, or only a middle name, shall appear on the ballot.”² MCL 168.560b(3). Forcing a candidate to use a name on their petition that is different than the name by which they appear on the ballot would not serve the clarifying purposes of the petition header requirements. Staff applies similar logic to Mr. Goyette’s challenge to Mr. Junge’s use of “Paul Junge” rather than “John Paul Junge” on the circulator certificate – there is not a clear requirement that circulator certificates be signed using a circulator’s full legal name, rather than a name that would be sufficient to identify the circulator.

For Mr. Goyette’s challenge to the address in the petition header, staff recommend that the Board follow the reasoning of the Michigan Court of Appeals in *Christenson v. Secretary of State*, 336 Mich. App. 411 (Mich. App 2021). In that case, the Court of Appeals found that, because the plain language of the statute did not require that a candidate list their residential address rather than their business address, there was not a strict requirement that the address listed on the Affidavit of Identity be the candidate’s residential address. Similar logic applies here – so long as the address in the header is associated with the candidate, staff recommends the Board decline to find petition sheets with that address invalid.³ And, because the address is associated with Mr. Junge and would be sufficient to identify him if questions arose as to the validity of the petition sheet, staff recommend that the Board reject the challenge to Mr. Junge’s address on the circulator certificate as well.

Regarding the specific signatures challenged, because the total 349 signatures challenged by Mr. Goyette was less than Mr. Junge’s 435 “cushion” of excess signatures, staff did not process the challenge.

STAFF RECOMMENDATION: Determine petition sufficient.

¹ Mr. Goyette also alleged that Mr. Junge designated a UPS box as his committee address. That issue has no bearing on the validity of Mr. Junge’s signatures, and so is not addressed here.

² Staff notes that Mr. Goyette claims Mr. Junge’s full name is John Paul Junge II, but Mr. Junge appears only as John Paul Junge in the Qualified Voter File. Staff is bound to rely on the information in the Qualified Voter File.

³ Staff notes that Mr. Junge registered to vote at the address appearing on the petition header on May 9, 2022, suggesting that the address in question was affiliated with Mr. Junge when petitions were being circulated.